

Exhibit 37

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BETHEL MINISTRIES, INC.,

*

Plaintiffs,

*

v.

*

No. 1:19-cv-01853-SAG

DR. KAREN B. SALMON, *et al.*,

*

Defendants.

*

* * * * *

SECOND DECLARATION OF JAMES KLARMAN

I, James Klarman, do solemnly declare and affirm under the penalties of perjury that the following facts are true and correct based upon my personal knowledge:

1. I am more than the age of 18 years and am competent to testify as a witness.
2. I am employed as the Nonpublic Schools Program Coordinator at the Maryland State Department of Education ("MSDE"). I have held this position since 2016.
3. As Non-public Schools Coordinator, I have personal knowledge of the matters set forth herein.
4. On February 21, 2018, I sent by email a copy of the memorandum dated January 9, 2018 that is attached as Exhibit 29 to Plaintiff's Cross Motion for Summary Judgment filed in this case to Claire Dant of Bethel Christian Academy.
5. A true and correct copy of my email to Ms. Dant transmitting the memo, without the attachment, is attached to this declaration as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

7/15/21
Date

James Klarman
James Klarman

Exhibit A

From: Jamie Klarman <james.klarman@maryland.gov>

To: Claire Dant <claire.dant@teambethel.org>

Subject: Handbook review information

Date: Wed, 21 Feb 2018 13:33:16 -0500

Attachments: [Enforcing Nondiscrimination and Reimbursement Memo_01-04-18_\(1\).docx](#)

Inline-Images: changingMD.png



Jamie Klarman

Nonpublic Schools Program
Coordinator

Maryland State Dept. of Education

Division of Business Services

200 W. Baltimore Street

Baltimore, Maryland 21201

james.klarman@maryland.gov
410-767-0141 (office)

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